

		Chavez		
P-25		Oath of Office & 2014 Evaluation for Virgilo Gonzales		
P-30		SAPD Internal Affairs Unit Investigation Report (Carlos-Resp-RFP-03261-03316, 03320, 03369-03396)		
P-30	A1	SAPD Internal Affairs Unit Investigation Report – Notice of Complaint – Detective John Doe (Carlos-Resp-RFP-032265)		
P-30	A2	SAPD Internal Affairs Unit Investigation Report – Notice of Complaint – Officer Carlos Chavez #1507 (Carlos-Resp-RFP-03266)		
P-30	A3	SAPD Internal Affairs Unit Investigation Report – Notice of Complaint – Officer Virgilo Gonzalez #1553 (Carlos-Resp-RFP-03267)		
P-30	B	SAPD Internal Affairs Unit Investigation Report – Roger Carlos Sworn Statement (Carlos-Resp-RFP-03268-03270)		
P-30	C	SAPD Internal Affairs Unit Investigation Report – Reser Report (Carlos-Resp-RFP-03272)		
P-30	D1	SAPD Internal Affairs Unit Investigation Report – 501 Use of Force Report – Detective John Doe (Carlos-Resp-RFP-03279)		
P-30	D2	SAPD Internal Affairs Unit Investigation Report – 501 Use of Force Report – Officer Carlos Chavez #1507 (Carlos-Resp-RFP-03282)		
P-30	D3	SAPD Internal Affairs Unit Investigation Report – 501 Use of Force Report – Officer Virgilo Gonzalez #1553 (Carlos-Resp-RFP-03283)		
P-31		Internal Affairs Case Log (Carlos-Resp-RFP-03397-03422)		
P-34	A	General Manual Section 200 – Rules & Regulations – 5/20/2014 (Carlos-Resp-RFP-03586)		
P-34	B	General Manual Section 303 – Disciplinary Procedures – 5/20/2014 (Carlos-Resp-RFP-03586)		
P-34	C	General Manual Section 501 – Use of Force – 5/20/2014 (Carlos-Resp-RFP-03586)		
P-34	D	General Manual Section 403 – Communion – 5/20/2014 (Carlos-Resp-RFP-03586)		
P-35		AVL Data for Gonzalez & Chavez for 14:25:43 – 15:14:23 (Carlos-Resp-RFP-03802)		

P-36	A	Dispatch File 1C 1425-1435 (Carlos-Resp-RFP-03803)		
P-36	B	Dispatch File 1C 1436-1447 (Carlos-Resp-RFP-03803)		
P-36	C	Dispatch File 3G 1418-1429 (Carlos-Resp-RFP-03803)		
P-36	D	Dispatch File 3G1429-1446 (Carlos-Resp-RFP-03803)		
P-36	E	Dispatch File 3L 1355-1406 (Carlos-Resp-RFP-03803)		
P-36	F	Dispatch File 3L 1406-1416 (Carlos-Resp-RFP-03803)		
P-36	G	Dispatch File 3L 1417-1422 (Carlos-Resp-RFP-03803)		
P-36	G1	Dispatch File 3L 1417-1422 (Cut: 0:00 – 1:28)		
P-36	H	Dispatch 3L Radio Log (Carlos-Resp-RFP-03803)		
P-36	I	Incident Reports from Dispatch (Carlos-Resp-RFP-03803)		
P-38		SAPD COBAN Footage – Officer Carlos Chavez’s Vehicle (Carlos-Resp-RFP-03259)		
P-40		SAPD COBAN Footage – Officer James Ybarra’s Vehicle (Carlos-Resp-RFP-04651)		
P-40	A	COBAN Footage with 3G Audio Dispatch Files (1418-1429) & (1429-1446)		
P-40	A1	COBAN Footage with 3G Audio (1418-1429) (Cut: 0:00 – 5:27)		
P-40	A2	COBAN Footage with 3G Audio (1418-1429) (Cut: 6:42-7:29)		
P-40	A3	COBAN Footage with 3G Audio (1429-1446) (Cut: 10:40-10:49)		
P-42	A1	David Byrd Audio Statement July 17, 2014 (audio file)		
P-42	A2	David Byrd Audio Statement July 17, 2014 (transcript)		
P-42	B1	David Byrd Audio Statement August 27, 2014 (audio file)		
P-42	B2	David Byrd Audio Statement August 27, 2014 (transcript)		
P-44		Detective John Doe Agreed Suspension		
P-45		Oath of Office & 2014 Evaluation for Detective John Doe		
P-46		Aerial Photograph – 4k-w-roads		
P-46	A1	Aerial Photograph – zoomed-4k-w-crop		
P-46	A2	Aerial Photograph – zoomed-4k-w-roads		

P-46	AA1	Aerial Photograph – zoomed-4k-w-roads2		
P-47		Color Photograph of Josue Gonzalez		
P-48		Color Photograph of Roger Carlos – May 20, 2014		
P-49		Photograph of Roger Carlos at the scene on May 20, 2014 – full body (Gonzales Ex. 3)(Carlos-Resp-RFP-04651)		
P-50		Photograph of Roger Carlos at the scene on May 20, 2014 – right face (Gonzales Ex. 4)(Carlos-Resp-RFP-04652)		
P-51		Photograph of Roger Carlos at the scene on May 20, 2014 – left face (Gonzales Ex. 5)(Carlos-Resp-RFP-04653)		
P-52		Photograph of Roger Carlos at the scene on May 20, 2014 – wrist (Gonzales Ex. 6)(Carlos-Resp-RFP-04654)		
P-53		Photograph of Roger Carlos at the scene on May 20, 2014 – elbow (Gonzales Ex. 7) (Carlos-Resp-RFP-04655)		
P-54		Virgilo Gonzales Agreed Suspension (Gonzales Ex. 11)		
P-56		Carlos Chavez Agreed Suspension (Chavez Ex. 14)		
P-74		SAPD Use of Force Report – Carlos Chavez (Reser Ex. 36)		
P-75		SAPD Use of Force Report – Det. John Doe (Reser Ex. 37)		
P-81		Photograph of the Scene (Roger Carlos Deposition (Ex. 41A)		
P-86		<i>Expert report of Ron Martinelli, PhD. (11/5/2018)*</i>		
P-86	A	CV of Ron Martinelli, PhD.		
P-87		<i>Ron Martinelli, PhD. – Site Inspection Report*</i>		
P-87	A	Ron Martinelli, PhD. – Site Inspection Report - Photographs (p. 5-7) with commentary redacted (Exhibit is only photos)		

Plaintiff pre-marked but has not yet offered these exhibits

Plaintiff reserves the right to supplement this designation of trial exhibits. Plaintiff hereby cross-designates any and all exhibits identified by any party in this case. Plaintiff also reserves the right to designate any exhibit to any deposition taken after the date of this designation of trial exhibits.

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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2024, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Western District of Texas, using the electronic case filing ("ECF") system of the Court. All counsel of record were served via electronic service through the ECF system.

- ☐ by certified U.S. mail, return receipt requested,
- ☐ by U.S. mail,
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- ☐ by fax,
- ☐ by common-carrier delivery,
- ☐ by e-mail,
- ☒ on the CM/ECF system, which will automatically serve a Notice of Electronic Filing

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